

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*Cleveland Bakers & Teamsters Health &
Welfare Fund v. Purdue Pharma L.P., et al.,*
Case No. 18-OP-45431 (N.D. Ohio).

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**PLAINTIFF'S MOTION FOR LEAVE TO
FILE FIRST AMENDED COMPLAINT
UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiff seeks leave of Court to file its First Amended Complaint in the above-listed case under seal on June 18, 2018. Plaintiff files this Motion and Proposed Order (attached as **Exhibit A**) to ensure compliance with CMO No. 2 (ECF Doc. 441) and the Protective Order Re: DEA's ARCOS/DADS Database (ECF Doc. 167).

Upon completion of the meet and confer process with Defendants regarding any disputes about what information should be kept confidential, Plaintiffs will file a redacted version of said First Amended Complaint in the public record. Plaintiff respectfully requests the option to proceed in this manner so there are no inadvertent disclosures of confidential information subject to CMO No. 2 or the ARCOS Protective Order.

WHEREFORE, Plaintiff respectfully requests that the Honorable Court grant Plaintiff's Motion for Leave to File First Amended Complaint Under Seal.

Dated June 18, 2018

Respectfully submitted,

s/Peter H. Weinberger

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Plaintiffs' Co-Liaison Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of June 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

s/Peter H. Weinberger

Peter H. Weinberger

Plaintiffs' Co-Liaison Counsel